

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI**

FATIMAH TUGGAR,)
Plaintiff,)
v.) Case No. 4:20-cv-00781
KANSAS CITY ART INSTITUTE,)
Defendant.)

DEFENDANT'S PARTIAL RULE 12(b)(6) MOTION TO DISMISS

COMES NOW Defendant Kansas City Art Institute (“KCAI”), by and through the undersigned counsel, and pursuant to FED. R. CIV. P. 12(b)(6), respectfully moves this Court for an order dismissing Counts I and II of Plaintiff’s Complaint. As set forth more fully in the accompanying Memorandum of Law In Support, which is incorporated herein by reference, Plaintiff’s claims under Missouri’s Workers’ Compensation Law have no merit as a matter of law and fail to state a claim upon which relief may be granted.

WHEREFORE, for the above and foregoing reasons, Defendant Kansas City Art Institute respectfully requests that this Court GRANT its motion, dismiss Counts I and II of Plaintiff’s Complaint, award KCAI its fees and costs in defending against these claims, and award such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Melody L. Rayl

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 6th day of October, 2020, the foregoing document was served via the Court's electronic filing system, with notice to be sent electronically to the following:

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